

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

Santana Bryson and Joshua Bryson,	*	
as Administrators of the	*	
Estate of C.Z.B., and as surviving	*	
parents of C.Z.B., a deceased minor,	*	
	*	Civil Action File
Plaintiffs,	*	
	*	No. 2:22-cv-17-RWS
v.	*	
	*	
Rough Country, LLC	*	
	*	
Defendant.	*	

**EXHIBIT LIST FOR
PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANT ROUGH
COUNTRY'S MOTION FOR SUMMARY JUDGMENT**

AND

**PLAINTIFFS' RESPONSE TO ROUGH COUNTRY LLC'S
STATEMENT OF UNDISPUTED MATERIAL FACTS AND
PLAINTIFFS' STATEMENT OF ADDITIONAL
DISPUTED MATERIAL FACTS**

- Ex. 1 G. Bryant Buchner, P.E. Report (October 12, 2023)
- Ex. 2 Deposition of Paul Lewis, Jr., M.S., BME taken on March 18, 2024
Excerpt
- Ex. 3 Deposition of Paul Lewis, Jr., M.S., BME Exhibit 6 – Paul Lewis, Jr.
Report (October 16, 2023)
- Ex. 4 Vehicle Compatibility Agreement [Mar 4 2004. NHTSA Docket Letter
and Report “Enhancing Vehicle-to-Vehicle Crash Compatibility,
Commitment for Continued Progress by Leading Automakers”

- Ex. 5 *Bacho v. Rough Country* Complaint
- Ex. 6 *Mendoza v. Heckenthorn Products* Complaint
- Ex. 7 Rule 30(b)(6) Deposition of Rad J. Hunsley on behalf of Rough Country, LLC [Doc. 97]
- Ex. 8 P. Just to W. Bradshaw emails [RC-BRYSON006869-6870]
- Ex. 9 Summers & Prasad, NHTSA, “NHTSA’s Recent Compatibility Test Program.”
- Ex. 10 Greenwell Report, NHTSA, “Evaluation of the Enhancing Vehicle-to-Vehicle Crash Compatibility Agreement: Effectiveness of the Primary and Secondary Energy-Absorbing Structures on Pickup Trucks and SUVs”
- Ex. 11 Christopher Roche Supplemental Report (November 17, 2023)
- Ex. 12 *Mendoza v. Heckenthorn Products* collision photographs
- Ex. 13 Rough Country 30(b)(6) Dep., Ex. 6, 12/22/14 Email string
- Ex. 14 Will Holloway Order Confirmation
- Ex. 15 Christopher Roche Dep. Ex. 2
- Ex. 16 Defendant Rough Country, LLC’s Second Supplemental Response to Plaintiffs’ First Interrogatories
- Ex. 17 Rough Country Development Protocol [RC-BRYSON008309]
- Ex. 18 Defendant Rough Country, LLC’s Responses and Objections to Plaintiffs’ Requests to Admit
- Ex. 19 *Bacho v. Rough Country*, Defendant Rough Country LLC’s Initial Disclosures
- Ex. 20 Georgia Department of Driver Services DUI Report
- Ex. 21 Georgia Department of Driver Services Distracted Driving Report
- Ex. 22 Deposition of G. Bryant Buchner, P.E. taken on January 23, 2024 Excerpt
- Ex. 23 G. Bryant Buchner, P.E. Dep. Ex. 7

Ex. 24 Deposition of Wesley D. Grimes taken on May 9, 2024 Excerpt

Ex. 25 Stax, Inc. Marketing Survey Excerpt - CONFIDENTIAL